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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

REYES QUINONEZ,

Defendant.

CASE NO. 1:23-CR-00054-JLT-SKO

AMENDED STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT; ORDER

DATE: February 7, 2024
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

This case is set for status conference on February 7, 2024. By this stipulation, defendant now moves to continue the status conference until March 6, 2024, and to exclude time between February 7, 2024, and March 6, 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv).

a) The government represents that discovery in this matter, including officer worn body camera, police reports, and other items have been produced to defense.

b) Defense counsel requests the additional time to review the discovery, meet with his client, conduct independent investigation, and pursue a pretrial resolution of the case. The government and defense counsel have been in communication about a pretrial resolution of the case and need the additional time to continue those discussions. The government plans to submit a formal offer to the defendant before the next status conference.

1 c) Counsel for defendant believes that failure to grant the above-requested
2 continuance would deny him/her the reasonable time necessary for effective preparation, taking
3 into account the exercise of due diligence.

4 d) The government does not object to the continuance.

5 e) Based on the above-stated findings, the ends of justice served by continuing the
6 case as requested outweigh the interest of the public and the defendant in a trial within the
7 original date prescribed by the Speedy Trial Act.

8 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
9 et seq., within which trial must commence, the time period of February 7, 2024 to March 6,
10 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) because it
11 results from a continuance granted by the Court at defendant's request on the basis of the Court's
12 finding that the ends of justice served by taking such action outweigh the best interest of the
13 public and the defendant in a speedy trial.

14 2. Nothing in this stipulation and order shall preclude a finding that other provisions of the
15 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
16 must commence.

17 IT IS SO STIPULATED.

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20 Dated: January 31, 2024

PHILLIP A. TALBERT
United States Attorney

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22 /s/ JUSTIN J. GILIO
JUSTIN J. GILIO
Assistant United States Attorney

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25 Dated: January 31, 2024

/s/ REED GRANTHAM
REED GRANTHAM
Counsel for Defendant
Reyes Quinonez

ORDER

IT IS SO ORDERED.

DATED: 2/1/2024

Sheila K. Oberto

THE HONORABLE SHEILA K. OBERO
UNITED STATES MAGISTRATE JUDGE